



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105**

April 2, 2015

Certified Mail: 7001 0320 0002 0253 7587  
Return receipt requested

Mr. Steve Moreland  
Environmental Manager  
Paul Oil, Inc.  
524 N. Sierra Ave.  
Oakdale, CA 95361

Re: Notice of Violations and Request for Information under the Clean Water Act for Paul Oil, Inc. in Oakdale, CA, and Patterson, CA

Dear Mr. Moreland:

The U.S. Environmental Protection Agency ("EPA") conducted inspections on November 4, 2014, at the Paul Oil, Incorporated ("Paul Oil") facilities located at 524 North Sierra Avenue in Oakdale, California ("Oakdale Facility"), and 511 South 2nd Street in Patterson California ("Patterson Facility") (collectively, the "Facilities"). The inspections were performed pursuant to EPA's authority under Section 311(m)(2) of the Clean Water Act ("Act"), 33 U.S.C. § 1321(m)(2), to assess compliance with the Spill Prevention, Control, and Countermeasure ("SPCC") requirements in Section 311 of the Clean Water Act and in Title 40 of the Code of Federal Regulations, Part 12 ("SPCC Rule"). This correspondence follows those inspections, to notify you of the violations identified during the inspections, and request that you provide additional information related to Paul Oil's compliance with the requirements of the SPCC Rule at the Facilities.

Based on these inspections, EPA has determined that Paul Oil violated the SPCC rule at the Facilities by failing to, among other things, certify and obtain management approval of the SPCC plan, provide adequate secondary containment for the aboveground storage tanks and mobile containers, conduct inspections and tests, and provide SPCC training for oil-handling personnel. In addition, Paul Oil violated the SPCC rule at the Patterson Facility by failing to correct visible discharges of oil from an above-ground storage container and remove

accumulations of leaked oil. These violations are described more fully in the enclosed Notice of Violations.

The Notice of Violations identifies requirements necessary for Paul Oil to come into compliance with federal law at the Facilities. Enclosed are copies of the Inspection Reports for the Facilities. The full text of the SPCC rule is available on EPA's website at <http://www.epa.gov/OEM/content/lawsregs/opprover.htm>.

In addition, pursuant to Sections 308 and 311(m) of "Act", 33 U.S.C. §§ 1318 and 1321(m), Paul Oil is required to furnish the information and documents specified in the enclosed Information Request. Paul Oil must respond to the information request within thirty (30) days of receipt of this letter. Additionally, please be advised that EPA is seeking information from Paul Oil to determine the cost of non-compliance with the SPCC Rule.

You may have been provided during the inspection with a Small Business Regulatory Enforcement and Fairness Act (SBREFA) Information Sheet. If not, please see <http://nepis.epa.gov/Exe/ZyPDF.cgi/P100BYAV.PDF?Dockey=P100BYAV.PDF>. The Information Sheet is designed to provide information on compliance assistance and inform small businesses of their rights to comment to the SBREFA Ombudsman concerning EPA enforcement activities. Be aware that SBREFA does not eliminate your responsibilities to respond to this letter within the required time, nor does it create any new rights or defenses under the law.

Please direct any questions you may have to Connor Adams of my staff at (415) 947-4109 or [adams.connor@epa.gov](mailto:adams.connor@epa.gov), or have your legal counsel contact Xiao Zhang in our Office of Regional Counsel at (415) 972-3266 or [zhang.xiao@epa.gov](mailto:zhang.xiao@epa.gov). We appreciate your cooperation and prompt attention to this matter.

Sincerely,



Claire Trombadore, Assistant Director  
Water and Pesticides Branch  
Enforcement Division

Enclosures

- Notice of Violations (4 pages)
- Information Request (7 pages)
- November 4, 2014 Inspection Reports (26 pages)